

**Remarks/Arguments**

Claims 1-38 have been rejected by the Examiner.

Claims 1-5, 7, 9, 11 and 32 have been amended.

Claims 1-38 are pending in the application.

Reconsideration and allowance of Claims 1-38 is respectfully requested in view of the following:

**Preliminary Comments:**

The Applicants wish to thank the Examiner and the Primary Examiner for the productive phone conference held on April 11, 2006, and for the useful suggestions made by both with regard to favorably disposing of this case.

**Explanation for Amendments to the Claims:**

The preambles of Claims 1-4 have been amended to clarify that the claims are directed to a computer-readable medium comprising computer-readable instructions for implementing the specific computer-based method described by the claim limitations. Claims 1, 5, 7, 9, and 11 have also been amended to clarify that the presentation tier includes "a page data structure providing a generalized view of data for a page supplemented by metadata for field labels, domain lists, edit rule definitions, help content, and other extended attributes to enable generating the user interface for the page", and that the element of "determine[ing] task sequencing" is performed for the purpose of "updating and verifying a plurality of tasks related to data to be acquired from a database such that all of the plurality of tasks may be completed, verified, and error free in order to build a page data model from the data" as explained in the specification. Claim 32 has been amended to correct punctuation. Furthermore, Claim 38 has been amended to include all the limitations of the newly amended Claim 11 along with all the claims previously dependent therefrom. These amendments notwithstanding, however, it is the Applicants' explicit intent that these amended claims retain the full scope and breadth of the original, unamended claims, including all equivalents thereto. Applicants respectfully submit that these amendments should in no way be interpreted as narrowing the scope or breadth of said claims, and that nothing herein this Response and Amendment should be interpreted to the contrary.

**The Rejection of Claims 1-4 as being directed to non-statutory subject matter:**

Claims 1-4 were rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter. In response, Applicants have amended Claims 1-4 to clarify that the claim is directed to "a computer readable medium comprising computer readable instructions for providing client services..." In light of this amendment, Applicants respectfully submit that the aforementioned rejection of Claims 1-4 under 35 U.S.C. 101 have been rendered moot, and Applicants respectfully request that this rejection be withdrawn and the claims be allowed to issue.

**The Rejection of Claims 1-3, 5-11, 13-14, 16-27 and 34-36 as being anticipated by Cooperstone et al:**

Claims 1-3, 5-11, 13-14, 16-27 and 34-36 were rejected under 35 U.S.C 102(e) as being anticipated by Cooperstone et al (US Publish 2002/0022982) (Cooperstone). In response, Applicants have amended Claims 1-5, 7, 9, and 11 to clarify that the presentation tier includes "a page data structure providing a generalized view of data for a page supplemented by metadata for field labels, domain lists, edit rule definitions, help content, and other extended attributes to enable generating the user interface for the page", and that the element of "determine[ing] task sequencing" is performed for the purpose of "updating and verifying a plurality of tasks related to data to be acquired from a database such that all of the plurality of tasks may be completed, verified, and error free in order to build a page data model from the data." In light of these amendments, Applicants respectfully submit that these rejections have been rendered moot.

Cooperstone discloses a method of management of the benefit package grouping selected by a client including a management system having different applications linked to an interface tier which suggests actions/procedures based on information provided by a user. However, Cooperstone does not disclose a presentation tier including a page data structure providing a generalized view of data for a page supplemented by metadata for field labels, domain lists, edit rule definitions, help content, and other extended attributes to enable generating the user interface for the page, nor does Cooperstone suggest coupling an application service to a presentation tier to determine task sequencing for updating and verifying a plurality of tasks related to data to be acquired from a database such that all of the plurality of tasks may be completed, verified, and error free in order to build a page data model from the data. In contrast, independent Claim 1, as amended, requires "...[a] presentation tier

include[ing] a page data structure providing a generalized view of data for a page supplemented by metadata for field labels, domain lists, edit rule definitions, help content, and other extended attributes to enable generating the user interface for the page” as well as “...coupling an application service to the presentation tier to determine task sequencing updating and verifying a plurality of tasks related to data to be acquired from a database such that all of the plurality of tasks may be completed, verified, and error free in order to build a page data model from the data.” Independent Claims 5, 7, 9, and 11, as amended, also contain similar limitations.

In light of Applicants’ amendments, Applicants respectfully submit that Cooperstone does not disclose or suggest the subject matter of independent Claims 1, 5, 7, 9, and 11. In addition, dependent Claims 2-3, 6, 8, 10, 13-14, 16-27 and 34-36 which depend therefrom respectively further limit the subject matter of such independent claims in a patentable sense and therefore are allowable as well. Thus, for at least the reasons disclosed above for independent Claims 1, 5, 7, 9 and 11, Cooperstone does not disclose or suggest the subject matter of dependent Claims 2-3, 6, 8, 10, 13-14, 16-27 and 34-36.

In light of the amendments and the foregoing arguments, Applicants respectfully submit that the rejection of Claims 1-3, 5-11, 13-14, 16-27 and 34-36 under 35 U.S.C 102(e) as being anticipated by Cooperstone have been rendered moot, and Applicants therefore respectfully request that these rejections be withdrawn and that Claims 1-3, 5-11, 13-14, 16-27 and 34-36 be allowed to issue.

**The Rejection of Claims 4, 12, 15, 28-31, and 37-38 as being unpatentable over Cooperstone in view of Felkey et al:**

Claims 4, 12, 15, 28-31 and 37 were rejected under 35 U.S.C 103(a) as being unpatentable over Cooperstone in view of Felkey et al (US Publish 2002/0161667) (Felkey). In response, and as noted above, Applicants have amended Claims 1 and 11 to clarify that the presentation tier includes “a page data structure providing a generalized view of data for a page supplemented by metadata for field labels, domain lists, edit rule definitions, help content, and other extended attributes to enable generating the user interface for the page”, and that the element of “determine[ing] task sequencing” is performed for the purpose of “updating and verifying a plurality of tasks related to data to be acquired from a database such that all of the plurality of tasks may be completed, verified, and error free in order to build a page data model

from the data.” In light of these amendments, Applicants respectfully submit that these rejections have been rendered moot.

Dependent Claim 4 depends from, and further limits, independent Claim 1 (as amended) in a patentable sense and therefore is allowable for at least the reasons disclosed above for independent Claim 1. Thus, the combination of Cooperstone and Felkey do not render the subject matter of Claim 4 obvious as neither reference, alone or in combination, teaches each and every element of Claim 4. Likewise, Dependent Claims 12, 15, 28-31, and 37 depend from, and further limit, independent Claim 11 in a patentable sense and therefore are allowable for at least the reasons disclosed above for independent Claim 11. Thus, the combination of Cooperstone and Felkey do not render the subject matter of Claims 12, 15, 28-31 and 37 obvious for the same reasons.

In light of the amendments to Claims 1 and 11, Applicants respectfully submit that the rejection of Claims 4, 12, 15, 28-31 and 37 under 35 U.S.C 103(a) as being unpatentable over Cooperstone in view of Felkey have been rendered moot, and Applicants therefore respectfully request that these rejections be withdrawn and that Claims 4, 12, 15, 28-31 and 37-38 be allowed to issue.

**The Rejection of Claims 32 and 33 as being unpatentable over Cooperstone et al and Felkey in view of Slater:**

Claims 32 and 33 were rejected under 35 U.S.C 103(a) as being unpatentable over Cooperstone and Felkey in view of Slater (US Publish 2003/0023676) (Slater). In response, and as noted above, Applicants has amended Claim 11 to clarify that the presentation tier includes “a page data structure providing a generalized view of data for a page supplemented by metadata for field labels, domain lists, edit rule definitions, help content, and other extended attributes to enable generating the user interface for the page”, and that the element of “determine[ing] task sequencing” is performed for the purpose of “updating and verifying a plurality of tasks related to data to be acquired from a database such that all of the plurality of tasks may be completed, verified, and error free in order to build a page data model from the data.” In light of this amendment, Applicants respectfully submit that these rejections have been rendered moot.

Dependent Claims 32 and 33 depend from, and further limit, independent Claim 11 in a patentable sense and therefore are allowable for at least the reasons disclosed above for independent Claim 11. Thus, the combination of Cooperstone, Felkey and Slater do not render the subject matter of Claims 32 and 33 obvious as neither reference, alone or in combination, teaches each and every element of Claim 4.

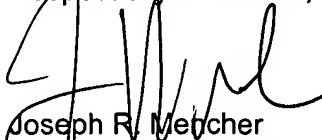
In light of the amendments to Claim 11, Applicants respectfully submit that the rejection of Claims 32 and 33 under 35 U.S.C 103(a) as being unpatentable over Cooperstone and Felkey in view of Slater have been rendered moot, and Applicants therefore respectfully request that these rejections be withdrawn and that Claims 32 and 33 be allowed to issue.

### Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the pending claims are drawn to novel subject matter that is patentably distinguishable over the prior art of record. The Examiner is therefore respectfully requested to allow the claims as amended herein.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the below listed telephone number.

Respectfully submitted,



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